

MAY 31 2001

010325

JENNIFER VIERECK: My name is Jennifer Viereck, V-i-e-r-e-c-k. And like the speaker to follow me, I'm speaking tonight on behalf of the Southeast Area Citizens' Advisory Committee to the Inyo County Board of Supervisors. Inyo County is the California county that's just on the other side of the road there. It's not entirely a Nevada problem. We're pretty worried too.

First of all, we're extremely appreciative of the enormous volume of research and work that's clearly gone into the further evolution of the repository design since the release of the first Draft EIS in 1999. It seems clear that the DOE has attempted to be responsive to some of the criticisms of that original document; however, several things do come immediately to mind.

1 [If the design is still so totally in a state of fluctuation, or evolution as it's called, why are we being asked to respond to it, and why is the EIS process moving forward? There are not clear definitions of the design put forward for the proposed action, nor are there clear alternatives for comparison.]

2 [There are a number of variables and parameters here that can be combined in different ways kind of like a soup recipe. They all seem to still be in the exploratory stage, and there are no clear conclusions for us to evaluate. We are very unsure whether this premature and incomplete approach to the EIS process is even legal, let alone ethical or responsible to the taxpayers or residents of our region.]

3 [The time period allowed for hearings and responses to this Supplement with its enormous and rather sketchily outlined changes in design, only 45 days seems completely inadequate to us. We don't deal with this on a professional level. We're people with families but we're concerned and we want time to review it.

Since the radiation regulations for the proposed repository have not been decided yet, therefore in our understanding delaying the Final EIS report and the recommendation process, we don't understand why this is so rushed.

In addition, we feel that many people outside this immediate region should have the right to comment and review these rather broad changes to what is really a huge national policy.]

4 [This Supplement does not take into account a number of serious discrepancies in the original Draft Environmental Impact Statement which have been pointed out, some in this very room, such as population and employment figures in this area. Therefore, we question whether the DOE's calculations in the Supplement could be accurate.]

- 5 This Supplement spells out in fairly outlined form a number of entirely new facilities and waste handling processes that seem to have enormous implications. A cooling pool, an above ground storage facility that could operate for up to 50 years, mixing and repackaging waste from all over the country -- I mean, I can't remember, what's the name of that place right now that's lost some of their rods? We're concerned about the record keeping and the problems that could happen with this. It seems like there's just an enormous margin for human error that's barely touched on in this document.
- 6 If storing waste for the next 50 years is now part of the Yucca Mountain plan, why is it not being stored on site where it is, thus eliminating all the transportation dangers to the public all over the country and to residents of this area while the DOE has further time to figure out what is really the safest thing to do?
- 7 Is exposing our region to this incomplete plan being done merely to avoid litigation from nuclear utility companies? The margin for human error in record keeping alone seems enormous. Potentially deadly
- 8 problems that have happened at other reactor sites, such as cranes getting jammed when lifting rods out of pools, lids being dropped on canisters, or gases threatening explosion, and I heard one story tonight about somebody dropping a soda can in a reactor, I don't know the details on that, could be magnified enormously.
- 9 The analysis of the potential impacts of these new facilities seem very incomplete. The accident scenario for the waste handling facility doesn't seem to include the storage pool or the rods that would be in it. It seems highly unlikely that this facility would even be licensed if it stood alone if it were held to the same criteria as other facilities currently being considered.
- 10 The only thing that seems completely clear to us from this document is that it is completely impossible for the Yucca Mountain project to meet its original mission -- to isolate high-level nuclear waste from the biosphere.

On page S-7 it states at the bottom that the mean annual dose will continue to rise after the arbitrary 10,000 year licensing period, that the peak dosage could range from 120 millirem to 260 millirems just up here at the 20 kilometer boundary on the freeway some 550,000 years from now.

We question has any other federal project, let alone one that is currently estimated to cost \$56 billion, ever guarantee its own failure right from the start?

- 11... Lastly, I would ask the DOE to take into account a recent study by the U.S. Geological Survey about storm draining in this immediate area. Apparently the already radioactive effluent from the Nevada Test Site and

11 cont potentially contaminated effluent from the Yucca Mountain area, based on studies done in 1995 and 1998 about rainfall, run directly into our Amargosa River.

This would affect the Death Valley within California, in addition to Lathrop Wells in Nevada, Death Valley Junction, Tecopa, Shoshone and all downstream from there along the Amargosa River. It would affect the Shoshone community and the land they've just been given to build their residential homes, and the 1.4 million visitors to the Death Valley National Park.

We are concerned about much speedier contamination to our watershed than previously thought. Thank you.